

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

DRM, INC., an Iowa corporation,

Plaintiff,

v.

BLM LAND, LLC, a Wisconsin limited  
liability company,

Defendant.

Case No.: 14-CV-754

PLAINTIFF, DRM, INC.'S, PROPOSED  
VOIR DIRE QUESTIONS

As required by the Court's Preliminary Pretrial Conference Order (Dkt. #14) in the above-captioned matter, as modified by the Court's text-only Order of April 7, 2015, Plaintiff, DRM, Inc. ("DRM"), proposes that the Court ask the jury the following voir dire questions in addition to the Court's standard voir dire questions:

1. Is everyone familiar with the Arby's chain of restaurants?
2. The Arby's restaurant involved in this case has an address of 2101 Morse Street in Janesville, Wisconsin and is part of a development called the Oasis located at Milton Avenue and I-90 in Janesville. Is anyone familiar with that particular Arby's restaurant?
3. Has anyone had a bad experience at an Arby's restaurant, including the Arby's restaurant that is involved in this case? If so, please describe outside the presence of the other jurors.
4. Has anyone ever eaten at a Del Taco restaurant? If so, tell us where the restaurant was located and describe the experience.

5. Has anyone ever eaten at a Panchero's restaurant? If so, tell us where the restaurant was located and describe the experience.

6. Is everyone familiar with the Chipotle chain of restaurants? Describe your impression/experiences at Chipotle restaurants.

7. Do any of you own property that you rent to tenants? If so, please describe the type of property and the tenant(s) to whom you rent.

8. Are any of you tenants, either because you rent residential space from a landlord, or because you are part of a business that is a tenant in commercial space rented by a landlord? If so, please tell us about your landlord-tenant relationship.

9. Do any of you own property that is subject to a restriction on the way you can use your property? If so, please describe the property, use restriction, how the use restriction has affected your ability to use the property, and whether you have been in any disputes over the use restriction.

10. Have any of you ever negotiated a use restriction on property? If so, please describe the property, the use restriction and whether there have been any disputes over the use restriction.

11. Do any of you have experience in purchasing real estate? If so, please describe that experience?

12. Do any of you have experience with having attorneys draft documents on your behalf? If so, please describe that experience.

13. Do any of you have experience negotiating a business deal? If so, please describe the experience.

Dated this 24<sup>th</sup> day of April, 2015.

By: /s/Paul E. Benson  
Paul E. Benson  
Christopher E. Nyenhuis

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